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Attorneys for YNS Funding, LLC, Aly Management, LLC and Yitzchok Blum

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

In re

THE LITIGATION PRACTICE GROUP,
P.C.,

Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

Adv. No. 8-25-ap-01191-SC

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT**

Complaint Filed: March 18, 2025
The Honorable Scott C. Clarkson

RICHARD A. MARSHACK, Trustee of
the LPG Liquidation Trust,

Plaintiff,

vs.

YNS FUNDING, LLC, et al.,

Defendants.

1 **PLEASE TAKE NOTICE** that Plaintiff and Chapter 11 Trustee Richard A. Marshack
2 (the “Trustee”) and Defendants YNS Funding, LLC (“YNS”), Aly Management, LLC (“Aly”) and
3 Yitzchok Blum (“Blum,” collectively, the “Defendants,” and together with the Trustee, the
4 “Parties”), hereby stipulate and agree (the “Stipulation”), through their respective counsel, as
5 follows:

6 A. On March 18, 2025, Plaintiff filed a Complaint for: (1) avoidance, recovery, and
7 preservation of 2-year actual fraudulent transfers; (2) avoidance, recovery, and preservation of 2-
8 year constructive fraudulent transfers; (3) avoidance, recovery, and preservation of 4-year actual
9 fraudulent transfers; (4) avoidance, recovery, and preservation of 4-year constructive fraudulent
10 transfers; (5) turnover; and (6) aiding and abetting against Blum. [Docket. No. 1].

11 B. The deadline for YNS, Aly, and Blum to respond to the Complaint is April 28,
12 2025. [Docket No. 4].

13 C. On April 25, 2025, to allow YNS, Aly, and Blum time to finalize retention of
14 counsel and to prepare a response, Plaintiff agreed to extend the deadline for YNS, Aly, and Blum
15 to file and serve any response to Plaintiff’s Complaint from April 28, 2025 to **May 12, 2025**.

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STIPULATION

WHEREFORE, based on the above and the foregoing, the Parties stipulate and agree as follows:

1. The deadline for YNS Funding, LLC, Aly Management, LLC, and Yitzchok Blum to file and serve any response to Plaintiff's Complaint shall be extended from April 28, 2025 to **May 12, 2025.**

IT IS SO STIPULATED.

Dated: April 28, 2025

DINSMORE & SHOHL LLP

By



Christopher B. Ghio
Special Counsel to Richard A. Marshack,
Trustee of the LPG Liquidation Trust

Dated: April 28, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By

/s/ Ira D. Kharasch

Ira D. Kharasch

Dated: April 28, 2025

**MORVILLO ABRAMOWITZ GRAND IASON &
ANELLO P.C.**

By



Christopher B. Harwood (*pro hac vice* application
forthcoming)

Attorneys for YNS Funding, LLC, Aly
Management, LLC and Yitzchok Blum